

**UNITED STATES DISTRICT COURT**

**DISTRICT OF ARIZONA**

United States of America

v.

Liam Wallace

Case No.: *25-5021m5*

**CRIMINAL COMPLAINT  
(Electronically Submitted)**

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

**COUNT 1**

Between on or between October 1, 2024 – December 31, 2024, in the District of Arizona, and elsewhere, Defendant Liam Wallace, knowingly transported an individual who had not attained the age of 18 years in interstate commerce, to wit, Jane Doe age 12, with the intent that the individual engage in any sexual activity for which any person can be charged with a criminal offense in violation of Title 18, United States Code, Section 2423(a). See Attachment A

I further state that I am a Special Agent from the FBI and that this complaint is based on the following facts:

**See Attached Statement of Probable Cause Incorporated By Reference Herein.**

Continued on the attached sheet and made a part hereof:

AUTHORIZED BY: s/Gayle L. Helart, AUSA *Gayle L. Helart*

Amber Lytton, Special Agent, FBI

Name of Complainant

Yes  
Digitally signed by GAYLE  
HELART  
Date: 2025.01.08 15:14:55  
-07'00'

No

Telephonically Sworn to and subscribed

Date

*January 8, 2025*  
*3:47PM*

at

Phoenix, Arizona

City and State

HONORABLE DEBORAH M. FINE

United States Magistrate Judge

Name & Title of Judicial Officer

AMBER LYTTON Digitally signed by AMBER LYTTON  
Date: 2025.01.08 15:09:05 -07'00'

Signature of Complainant

*Deborah M. Fine*

Signature of Judicial Officer

**Attachment A**

**Statutes**

**Count 1: Transportation With Intent to Engage in Criminal Sexual Activity.**

It is a violation under 18 U.S.C. § 2423(a) for a person to knowingly transport an individual who has not attained the age of 18 years in interstate commerce, with intent that the individual engage in any sexual activity for which any person can be charged with a criminal offense. In this case, it is alleged that the defendant, age 27, transported Jane Doe, age 12, from Arizona to Nevada and from Arizona to Utah with intent to engage in sexual intercourse and other sexual activity in violation of 18 U.S.C. Arizona Revised Statute 13-1405 (Sexual Conduct with a Minor); Nevada Revised State 201.230 (Lewdness with Child Under 16 Years); and Utah Criminal Code 76-5-404.1 (Sexual Abuse of Child)

A violation of 18 U.S.C. § 2423(a) is punishable by 10-life, \$250,000, and between 5 – lifetime supervised release.

**ELECTRONICALLY SUBMITTED STATEMENT OF PROBABLE CAUSE**

I, Amber Lytton, Special Agent with Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows, to wit:

**INTRODUCTION**

The facts of this case, as more fully detailed herein, are that on or about December 31, 2024, the Maricopa County (Arizona) Sheriff's Office (herein after MCSO) reported the arrest of LIAM WALLACE (herein after WALLACE) in Utah, by the Kane County (Utah) Sheriff's Office (KCSO), to the Phoenix office-Federal Bureau of Investigation (FBI). WALLACE was arrested on charges related to the kidnapping of a twelve-year-old girl (herein after JANE DOE), who had been reported to MCSO as missing, by her mother, on December 28, 2024.

Investigative efforts just after the report to MCSO showed that a phone known by investigators to be utilized by WALLACE was located near the Arizona-Utah border. KCSO utilized the location information for the phone and located WALLACE's semi-truck. KCSO contacted WALLACE while WALLACE's truck was pulled over on the side of the road and located both WALLACE and JANE DOE in the truck. Following the recovery of JANE DOE and the arrest of WALLACE, MCSO executed a search warrant on WALLACE's residence, located at 4802 N. 12th Street, Apartment 2301, Phoenix, Arizona, and seized numerous items, to include six (6) electronic devices from the bedroom determined to be utilized to WALLACE. In addition to the items seized by MCSO, KCSO seized WALLACE's cellular telephone, incident to his arrest. KCSO also seized JANE DOE's laptop computer, via consent by JANE DOE's parents, following her recovery. The items seized by MCSO at WALLACE's residence were transferred to FBI custody on January 6, 2024.

**PRELIMINARY BACKGROUND INFORMATION**

1. I am a Special Agent with the FBI assigned to the Phoenix Division. I have been so employed since 2016 and I am specifically assigned to conduct investigations related to violent crimes against children, to include investigations where adults with no parental or custodial authority transport children across state lines for sex. I am responsible for conducting federal investigations relating to crimes involving the sexual exploitation of children. I have received on-the-job training in the investigation of cases involving the sexual exploitation of children. The statements contained in this Affidavit are based on my experience and background as a Special Agent and on information provided by other law enforcement agents.
2. The purpose of this application is to provide probable cause for the arrest of LIAM WALLACE, age 27, for the violation of 18 U.S.C. § 2423(a) (Transportation of a Minor with Intent to Engage in Criminal Sexual Activity), which makes it a crime to knowingly transport an individual who has not attained the age of 18 years in interstate commerce, with intent that the individual engage in any sexual activity for which any person can be charged with a criminal offense.

**DETAILS OF THE INVESTIGATION**

3. On December 28, 2024, JANE DOE's mother reported JANE DOE as a missing juvenile to law enforcement. JANE DOE and her family live in the Phoenix area, within Arizona. JANE DOE's mother was aware that JANE DOE had been in contact with WALLACE and suspected JANE DOE was with WALLACE. JANE DOE had run away from home on previous occasions. Following one instance, WALLACE returned JANE DOE to her home and spoke with JANE DOE's mother. During that interaction, WALLACE introduced himself as the father of JANE DOE's fictitious, thirteen-year-old boyfriend, explaining that JANE DOE had been with the fictitious son. The video doorbell at JANE DOE's home captured at least a portion of the interaction with WALLACE and JANE DOE's mother, and a clear image of an adult male, later identified

as WALLACE, was captured.

4. JANE DOE had provided her mother with telephone number 480-277-1234, which JANE DOE's mother provided to investigators. AT&T records obtained by investigators confirmed that telephone number 480-277-1234 was registered to WALLACE. AT&T's records indicated two residential addresses for WALLACE's account: 4802 N. 12th Street, #2031, Phoenix, Arizona, and 1820 E. Hayden Lane, #227, Tempe, Arizona. Utilizing the identifying information provided by AT&T, investigators were able to access WALLACE's driver's license photo and confirm that the photo resembled the image of WALLACE from the video doorbell at JANE DOE's residence.

5. Investigators accessed location data for WALLACE's cellular telephone through an exigent request to AT&T and initially identified WALLACE's location as near Flagstaff, Arizona. Investigators were also able to identify information regarding WALLACE's employment as a truck driver and contacted an owner of the company for which WALLACE was employed, (hereafter "OWNER") OWNER initiated a three-way call with WALLACE and investigators, and WALLACE advised that he was traveling to Salt Lake City, Utah. WALLACE refused to pull over and meet with law enforcement.

6. Investigators in Arizona notified Kane County, Utah, Sheriff's Office (KCSO) who utilized the location information for the WALLACE's cellular telephone and located WALLACE's semi-truck. KCSO contacted WALLACE while WALLACE's truck was pulled over on the side of the road and located both WALLACE and JANE DOE in the vehicle. During the initial contact with law enforcement, WALLACE claimed to be alone in the vehicle. WALLACE then advised he was with his "lady," whom he advised was nineteen years old. Investigators located JANE DOE, the 12 year old girl reported missing by her mother, in WALLACE's truck and arrested WALLACE on state kidnapping charges.

7. In a post-arrest interview, after WALLACE was read his *Miranda* rights and agreed to speak with investigators, WALLACE advised he knew JANE DOE was 12

years old. WALLACE advised he had met JANE DOE online in late October or early November 2024. WALLACE told investigators that he had met JANE DOE in person five to seven times, and WALLACE had taken JANE DOE to California and Nevada, prior to their trip to Utah. WALLACE corroborated JANE DOE's mother's account of WALLACE claiming to be the father of JANE DOE's fictitious boyfriend. WALLACE denied ever having sexual contact with JANE DOE. When asked by investigators when WALLACE touched JANE DOE for the first time, WALLACE asked what JANE DOE had told investigators; WALLACE did not respond with a denial of contact at that time.

8. JANE DOE was also interviewed, following her recovery and WALLACE's arrest, at the Children's Justice Center in Kanab, Utah. During the interview, JANE DOE stated she met WALLACE on Teen Chat.<sup>1</sup> WALLACE initiated contact with JANE DOE on Teen Chat and then contacted JANE DOE over voice calls. JANE DOE stated she was "sneaking out almost every other night to go see [WALLACE]." JANE DOE initially advised that the first few times she met WALLACE in person, they did not have sex, but JANE DOE later disclosed sexual intercourse with WALLACE both at his apartment in Arizona and in Nevada. JANE DOE stated that JANE DOE and WALLACE "almost had sex" the second time they met in person, in the back of WALLACE's vehicle, after he traveled to a location provided by JANE DOE to meet JANE DOE. JANE DOE described being in the backseat of WALLACE's vehicle and "one thing led to another," but JANE DOE told WALLACE she didn't want to have sex on that occasion. JANE DOE told the interviewer that on one occasion, when WALLACE and JANE DOE met in person, WALLACE had taken JANE DOE to California. JANE DOE's mother picked JANE DOE up near the California-Arizona border, on WALLACE and JANE DOE's return to Arizona. JANE DOE told her mother she had been with a teenage boy. JANE DOE stated she and WALLACE did not have sex on the trip to California.

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<sup>1</sup> An internet search for "Teen Chat" shows that it is a place on the internet facilitating chat for individuals between 13-19 years old as a way to meet friends and talk in groups.

9. JANE DOE told the interviewer that two days after JANE DOE's return from California, JANE DOE went to WALLACE's apartment for the first time, and WALLACE had sex with JANE DOE at his apartment. JANE DOE stayed the night at WALLACE's apartment; WALLACE paid for a hotel for his roommate so WALLACE's roommate would not be there when WALLACE and JANE DOE had sex. Following that incident, WALLACE took JANE DOE home and met JANE DOE's mother, while pretending to be the father of JANE DOE's fictitious boyfriend.

10. JANE DOE described her trip to Nevada with WALLACE, to the interviewer; WALLACE needed to go to Las Vegas, Nevada for a work trip and WALLACE took JANE DOE. JANE DOE looked at WALLACE's phone during the drive and saw communications with two other females. JANE DOE described her frustration with WALLACE to the interviewer. JANE DOE felt as though WALLACE was cheating on JANE DOE, and JANE DOE blocked the other females from WALLACE's phone. WALLACE had sex with JANE DOE in the sleeper compartment of his semi-truck, before JANE DOE found WALLACE's communication with the other females, and WALLACE had sex with JANE DOE, again, on the trip back to Phoenix, Arizona, after JANE DOE blocked the other females from WALLACE's phone. When WALLACE and JANE DOE returned to WALLACE's apartment, in Phoenix, Arizona, WALLACE's roommate was at the apartment. WALLACE's roommate stayed at the apartment that night, as did WALLACE and JANE DOE.

11. The following day, on December 30, 2024, WALLACE had sex with JANE DOE, at his apartment in Phoenix, Arizona, when WALLACE and JANE DOE woke up in the morning. WALLACE then learned he had to drive to Salt Lake City, Utah, for work. Prior to leaving for Salt Lake City, Utah, WALLACE had sex with JANE DOE, again, in his apartment. JANE DOE identified items that she left in WALLACE's apartment when they left for Salt Lake, City to include her underwear, pants, shirt, and notebook.

12. When the interviewer asked JANE DOE to describe what JANE DOE meant when

JANE DOE said WALLACE and JANE DOE had sex, JANE DOE made a motion with her hands, inserting one finger, from one hand, into a circle made with her thumb and fingers, with her other hand. The interviewer asked JANE DOE to use words, and JANE DOE said “dick” and “vagina.” Then JANE DOE stated that she “really didn’t want to go into this.” When asked about the first time WALLACE had sex with JANE DOE, JANE DOE stated that they had stopped “a couple of times because it hurt.” JANE DOE said WALLACE had sex with JANE DOE both in the back of WALLACE’s Lincoln Navigator and in WALLACE’s semi-truck. JANE DOE advised that WALLACE never used “protection” when he had sex with JANE DOE, and after the first time WALLACE had sex with JANE DOE, they purchased Plan B.<sup>2</sup>

13. Following the recovery of JANE DOE and the arrest of WALLACE, MCSO executed a search warrant on WALLACE’s residence, located at 4802 N. 12th Street, Apartment 2301, Phoenix, Arizona, and seized numerous items, to include six (6) electronic devices from the bedroom determined to be utilized to WALLACE, female underwear, two journals that appear to belong to different females, and a positive swab for semen. One of the journals seized had a list of telephone numbers in the front, and the number listed for “mom” is JANE DOE’s mother’s phone number.

14. Wallace is currently located in the Kane County, Utah, jail.

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<sup>2</sup> Plan B is an over the counter emergency contraceptive pill that can be taken soon after unprotected sex to reduce the chance of an unplanned pregnancy.

**CONCLUSION**

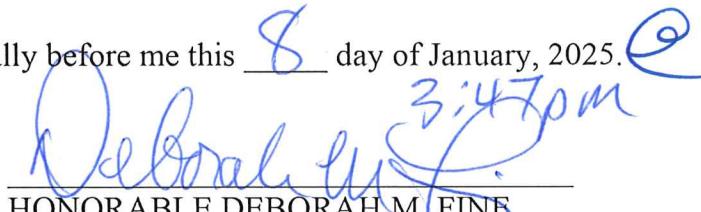
14. Based on the foregoing, I believe that there is probable cause that Liam Wallace knowingly transported a minor for criminal sexual activity in violation of 18 U.S.C. § 2423(a) (Transportation of a Minor for Criminal Sexual Activity).

Respectfully submitted,

AMBER LYTTON Digitally signed by AMBER LYTTON  
Date: 2025.01.08 15:09:48 -07'00'

Amber Lytton  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed telephonically before me this 8 day of January, 2025.

  
HONORABLE DEBORAH M. FINE  
United States Magistrate Judge